

EXHIBIT "A"

Exhibit to 30(b)(6) Notice of Deposition of Banc One Building Corporation

In accordance with Rule 30(b)(6), **Defendant Banc One Building Corporation** is requested to provide witnesses competent to testify with respect to the following issues and matters:

1. All discussions, negotiations, correspondence, and communication with regard to the formulation of any contract between Creedon Controls, Inc. and Banc One Building Corporation and/or Forest Electric Corporation, and which relate to the Banc One Core Data Center in Wilmington, Delaware;
2. All discussions, negotiations, correspondence, agreements and communications by and between Banc One Building Corporation and Forest Electric Corporation and/or its affiliates or subsidiaries, and with respect to the rights, responsibilities and duties of the defendants and Plaintiff for the construction of the project known as the "Banc One Core Data Center," in Wilmington, Delaware.
3. Any discussions, negotiations, or communications between this defendant and Tishman Construction Corp., or any of its subsidiaries and affiliates, relating to the contractual obligations of Tishman Construction Corporation, Banc One Building Corporation, and/or Forest Electric Corporation, relating to the Banc One Core Data Center in Wilmington, Delaware.
4. The nature and extent of the contractual obligations of Creedon Controls, Inc. with respect to the project known as "Banc One Core Data Center," in Wilmington, Delaware.
5. Whether Plaintiff, Creedon Controls, Inc., properly performed its obligations, pursuant to the agreements of the parties, with respect to the project known as the "Banc One Core Data Center," in Wilmington, Delaware.
6. Whether Plaintiff, Creedon Controls, Inc., is alleged to have improperly performed its obligations pursuant to the agreements of the parties and with respect to the project known as the "Banc One Core Data Center," in Wilmington, Delaware; and the precise nature of any such alleged improprieties or improper performance.
7. The scheduling and coordination of the work to be performed and materials supplied by Creedon Controls, Inc., at the project known as the "Banc One Core Data Center," in Wilmington, Delaware.
8. The nature, extent and manner of the scheduling and coordination of trades, contractors, and other parties, for the completion of the various stages of the project known as the "Banc One Core Data Center," in Wilmington, Delaware.
9. The nature of any claims of persons or entities, including sub-contractors, that the project known as the "Banc One Core Data Center," in Wilmington, Delaware was improperly managed, scheduled or coordinated.

10. The nature of any claims of governmental entities, that the project known as the "Banc One Core Data Center," in Wilmington, Delaware was improperly managed, scheduled or coordinated.
11. The persons or entities responsible for any delays or improper scheduling or coordination of the project known as the "Banc One Data Center" in Wilmington, Delaware.

RKB/msj; 06894-0001